

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

NICHOLAS M. MARTIN,

Plaintiff,

v.

FOSCO FULLETT ROSENLUND, P.C.,

Defendant.

Case No.: 09-CV-6236

Judge: Hon. Samuel Der-Yeghiayan

Magistrate Judge: Hon. Jeffrey Cole

**UNOPPOSED MOTION FOR ENLARGEMENT OF TIME**

NOW COMES Defendant FOSCO FULLETT ROSENLUND, P.C., by its attorneys David M. Schultz and Daniel R. Degen, pursuant to Federal Rule of Civil Procedure 6(b), respectfully request that this Court grant a 28 day enlargement of time to file a responsive pleading to the plaintiff's complaint, and in support thereof, states as follows:

1. On October 6, 2009, plaintiff filed a one count complaint alleging violations of the Fair Debt Collection Practices Act ("FDCPA").
2. Defendant was served on October 8, 2009.
3. Defense counsel was just retained and needs additional time to analyze the issues in this case.
4. Defendant requests an additional 28 days or until November 25, 2009 to answer or otherwise plead to the complaint.
5. Defense counsel has discussed the requested enlargement with Plaintiff's counsel and there is no objection.

6. Likewise, both parties are aware that there is a status hearing set for November 17, 2009 at 9:00 a.m. on this matter.

7. The parties have discussed re-setting the status hearing date until a time after Defendant has answered or otherwise plead. The parties suggest December 8, 2009 at 9:00 a.m.

8. There is no objection to the re-setting the status hearing date to December 8, 2009 at 9:00 a.m.

9. The enlargement of time is not meant for purposes of delay.

WHEREFORE, Defendant, FOSCO FULLETT ROSENLUND, PC requests that this Court grant a 28 day enlargement of time until November 25, 2009 to file a responsive pleading to the complaint, to strike the current status date of November 17, 2009 and re-set the status date to December 8, 2009 at 9:00 a.m.

Respectfully submitted,

FOSCO FULLETT ROSENLUND, PC

By: s/Daniel R. Degen  
One of Its Attorneys

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